

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
811 Solid Waste Landfill Inspection Checklist

FOI

County: St. Clair LPC#: 1630755017 Region: 6 - Collinsville
 Location/Site Name: Marissa/Cottonwood Hills
 Date: 12/15/2011 Time: From 9:45AM To 11:00AM Previous Inspection Date: 11/22/2011
 Inspector(s): Michael Gates Weather: Cloudy, Approx 50 degrees, Wet
 No. of Photos Taken: # 10 Samples Taken: Yes # No ☒
 Interviewed: Mr. Bill Raynor Facility Phone No.: 618-295-2809

Permitted Owner Mailing Address

Waste Management of Illinois, Inc.
 601 Madison Road
 East St. Louis, IL 62201

Permitted Operator Mailing Address

Waste Management of Illinois, Inc.
 10400 Hillstown Road
 Marissa, IL 62257

Chief Operator Mailing Address

Certified Operator Mailing Address

Mr. Bill Raynor
 10400 Hillstown Road
 Marissa, IL 62257

RECEIVED

JUN - 5 2012

IEPA/BOL/WRCS

AUTHORIZATION:

Significant Modification Permit
 Initial: 1998-110-LF
 Latest 203-453-(MOD #42)

OPERATIONAL STATUS:

Operating ☒
 Closed-Not Certified. ☐
 Closed-Date Certified:

TYPE OF OPERATION:

Existing Landfills 814-Subpart C ☐
 814-Subpart D ☐
 New Landfills: 811-Putres./Chem. ☒

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	12(f)	CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	<input type="checkbox"/>
6.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input type="checkbox"/>
7.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)-	Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	<input type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input type="checkbox"/>
8.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input type="checkbox"/>
9.	21(f)(1)	CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	<input type="checkbox"/>

IEPA - DIVISION OF RESOURCE PROTECTION
 RELEASE

JUN 21 2012

REVIEWER

Revised 10/6/2009

(811 Solid Waste-1)

WM03265

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
	(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	55(k)	NO PERSON SHALL:	
	(1)	Cause or Allow Water to Accumulate in Used or Waste Tires	<input type="checkbox"/>
	(4)	Transport Used or Waste Tires in Violation of the Registration and Placarding Requirements	<input type="checkbox"/>
20.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
21.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			

22.	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
23.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
24.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<input type="checkbox"/>
25.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS	<input type="checkbox"/>
26.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS	
	(a)	Delivery of Special Waste to Hauler	<input type="checkbox"/>
	(g)	Retention of Special Waste Manifests	<input type="checkbox"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART	GENERAL STANDARDS FOR ALL LANDFILLS	
27.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
28.	811.104	SURVEY CONTROL	
	(a)	Boundaries Surveyed and Marked	<input type="checkbox"/>
	(b)	Stakes and Monuments Marked	<input type="checkbox"/>
	(c)	Stakes and Monuments Inspected	<input type="checkbox"/>
	(d)	Control Monument Established and Maintained	<input type="checkbox"/>
29.	811.105	COMPACTION	<input type="checkbox"/>
30.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
31.	811.107	OPERATING STANDARDS	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Work Face Size and Slope	<input type="checkbox"/>
	(c)	Equipment	<input type="checkbox"/>
	(d)	Utilities	<input type="checkbox"/>
	(e)	Maintenance	<input type="checkbox"/>
	(f)	Open Burning	<input type="checkbox"/>
	(g)	Dust Control	<input type="checkbox"/>
	(h)	Noise Control	<input type="checkbox"/>
	(i)	Vector Control	<input type="checkbox"/>
	(j)	Fire Protection	<input type="checkbox"/>
	(k)	Litter Control	<input type="checkbox"/>
	(l)	Mud Tracking	<input type="checkbox"/>
	(m)	Liquid Restrictions for MSWLF Units	<input type="checkbox"/>
32.	811.108	SALVAGING	

	(a)	Salvaging Interferes with Operation	<input type="checkbox"/>
	(b)	Safe and Sanitary Manner	<input type="checkbox"/>
	(c)	Management of Salvagable Materials	<input type="checkbox"/>
33.	811.109	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>
34.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(a)	Final Slopes and Contours	<input type="checkbox"/>
	(b)	Drainage Ways and Swales	<input type="checkbox"/>
	(c)	Final Configuration	<input type="checkbox"/>
	(d)	Written Closure Plan	<input type="checkbox"/>
	(e)	Initiation of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(f)	Completion of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(g)	Deed Notation for MSWLF Units	<input type="checkbox"/>
35.	811.111	POST-CLOSURE MAINTENANCE	
	(a)	Procedures After Receipt of Final Volume of Waste	<input type="checkbox"/>
	(b)	Remove All Equipment of Structures	<input type="checkbox"/>
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	<input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units	<input type="checkbox"/>
36.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	<input type="checkbox"/>
	(b)	Load Checking Requirements	<input type="checkbox"/>
	(c)	Gas Monitoring Records	<input type="checkbox"/>
	(d)	MSWLF Liquid Restriction Records	<input type="checkbox"/>
	(e)	Groundwater Monitoring Program Requirements	<input type="checkbox"/>
	(f)	Closure and Post Closure Care Requirements	<input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements	<input type="checkbox"/>
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	
37.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	<input type="checkbox"/>
38.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	<input type="checkbox"/>
	(c)	Standards for On-Site Treatment and Pretreatment	<input type="checkbox"/>
	(d)	Standards for Leachate Storage System	<input type="checkbox"/>
	(e)	Standards for Discharge to Off-Site Treatment	<input type="checkbox"/>
	(f)	Standards for Leachate Recycling Systems	<input type="checkbox"/>
	(g)	Standards for Leachate Monitoring Systems	<input type="checkbox"/>
39.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	<input type="checkbox"/>
	(c)	Monitoring Frequency for Landfill Gas	<input type="checkbox"/>
	(d)	Monitoring Parameters	<input type="checkbox"/>

40.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	<input type="checkbox"/>
	(b)	Notification and Implementation Requirements	<input type="checkbox"/>
	(c)	Standards for Gas Venting	<input type="checkbox"/>
	(d)	Standards for Gas Collection	<input type="checkbox"/>
41.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	<input type="checkbox"/>
	(d)	Gas Flow Rate Measurements into Treatment of Combustion Device	<input type="checkbox"/>
	(e)	Standards for Gas Flares	<input type="checkbox"/>
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	<input type="checkbox"/>
	(g)	Gas Transported Off-Site	<input type="checkbox"/>
42.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	<input type="checkbox"/>
	(b)	Runoff and Infiltration Control	<input type="checkbox"/>
	(c)	Maintenance of Intermediate Cover	<input type="checkbox"/>
43.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(a)	General Requirements	<input type="checkbox"/>
	(b)	Standards for Low Permeability Layer	<input type="checkbox"/>
	(c)	Standards for Final Protective Layer	<input type="checkbox"/>
44.	811.316	PLUGGING AND SEALING OF DRILL HOLES	
45.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
46.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	<input type="checkbox"/>
	(b)	Slopes Required to Drain	<input type="checkbox"/>
	(c)	Vegetation	<input type="checkbox"/>
	(d)	Structures Built over the Unit	<input type="checkbox"/>
47.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	<input type="checkbox"/>
	(b)	Load Checking Program for PCB's at MSWLF Units	<input type="checkbox"/>
	(c)	Load Checking Program Components	<input type="checkbox"/>
	(d)	Handling Regulated Hazardous Wastes	<input type="checkbox"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
48.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
49.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
50.	811.404	IDENTIFICATION RECORD	

LPC #: 1630755017

Inspection Date: 12/15/2011

	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
51.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
52.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<input type="checkbox"/>
	PART 811 SUBPART G	FINANCIAL ASSURANCE	
53.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
54.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
55.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
56.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
SOLID WASTE FEE SYSTEM REQUIREMENTS			
57.	Part 858 Subpart B	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS WEIGHED (LIST SPECIFIC SECTION	<input type="checkbox"/>
58.	Part 858 Subpart C	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS NOT WEIGHED (LIST SPECIFIC	<input type="checkbox"/>
OTHER REQUIREMENTS			
59.	OTHER:	APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
60.			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (o) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.

Revised 10/6/2009

(811 Solid Waste-6)

WM03270

Inspection Date: 12/15/2011

PERMIT NUMBER

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

NARRATIVE EVALUATION DOCUMENT

Date of Review: December 15, 2011

Reviewer: Michael Gates

Site Code: 1630755017

County: St. Clair

Site Name: Marissa/WMI Cottonwood Hills

Time: 9:45AM - 11:00AM

GENERAL REMARKS

On December 15, 2011 an inspection of the Waste Management Cottonwood Hills Recycling & Disposal Facility in Marissa, IL, was conducted. The weather at the time of the inspection was cloudy, approximately 50 Degrees Fahrenheit, and the ground wet. Ten digital photographs were taken to document the inspection on this day.

Mr. Bill Raynor of Waste Management was interviewed for the inspection. This inspection was conducted as a result of Cottonwood Hills Recycling & Disposal Facility being permitted by the IEPA to handle municipal solid waste and non-hazardous special waste. The permit number is 2003-453 (MOD #42).

Prior to the onsite inspection of Cottonwood Hills, an odor complaint was forwarded from the Collinsville IEPA office. This inspector drove into Marissa from the east off of State Route 4, as this was downwind from the landfill. A smell was detected around the 600 Block of E. Lyons. The smell grew stronger closer to Main Street. The inspection continued across Main Street to the end of W. Lyons. The smell ceased at N. Park, one street off of Main. I then backtracked to Main street turned left and noticed the smell again. The smell seemed to get stronger as I approached a directional boring rig. Two rigs were observed boring in opposite directions. The smell was strongest rig next to the equipment. Once past the rigs the smell ceased. They were on the west side of main. It's possible they hit a pocket of gas, a sewer line, or it may be the liquid used during the boring process. It was not determined it was an odor from the landfill or methane form the landfill.

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

JUN 21 2012

REVIEWER [initials]

The daily municipal trash intake this month is approximately 2200 tons of municipal waste per day. The active area is located in the southern area of the landfill and they are moving to the top of the mound. The south slope of mound has been seeded and strawed. Grass has started to grow in this area. At the time of this inspection several frameless trailers were observed dumping. No loads of auto fluff were observed during this inspection. Mr. Raynor stated they are still accepting loads of ash from the Baldwin Plant. During this inspection, two 836 compactors, one dozer, and the tipper were operating at the time of this inspection in the active area. No tires, white goods or yard waste were observed dumped in the active area. There were two tires that had been placed next to the tipper prior to this inspection. The well had been raised and Hank's will be out at a later date to tie them in to the system. One excavator was observed in the area they have established as a solidification pit. Mr. Raynor stated CWH will no longer be accepting the sludge from Milam. Milam has received it modification to allow for more liquid sludge. They have placed two large roll off in the ground and use onsite dirt to mix into the sludge before placing it in the active area. Most of the site is green this is due to the several inches of rain that has fallen the past few weeks. The gas flare was operational and visible on this day. Mr. Raynor stated when the new wells are tied into the system they will increase the volume of gas burned off by the flare. The roads throughout the site appear to be holding well considering they received over an inch of rain. No signs of leachate seepage or methane gas migration were detected. No apparent violations were observed during this inspection (Photos 1-10).

After the inspection of the landfill Mr. Raynor was informed of the odor complaint. We went back into town and covered the steps prior to the inspection. The same results were discovered. The smell was strongest next to the boring equipment. Spoke to the foreman at the Waste water treatment plant and he stated he hadn't smelled anything from the landfill. No odor was detected from the WWTP.

**The appearance of some of the images
following this page is due to**

Poor Quality Original Documents

and not the scanning or filming processes.

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J:\tools\poorDocs.doc

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: December 15, 2011

Inspector: Michael Gates

Site Code: 1630755017

County: St. Clair

Site Name: Marissa/Cottonwood Hills

Time: 9:45AM - 11:30AM

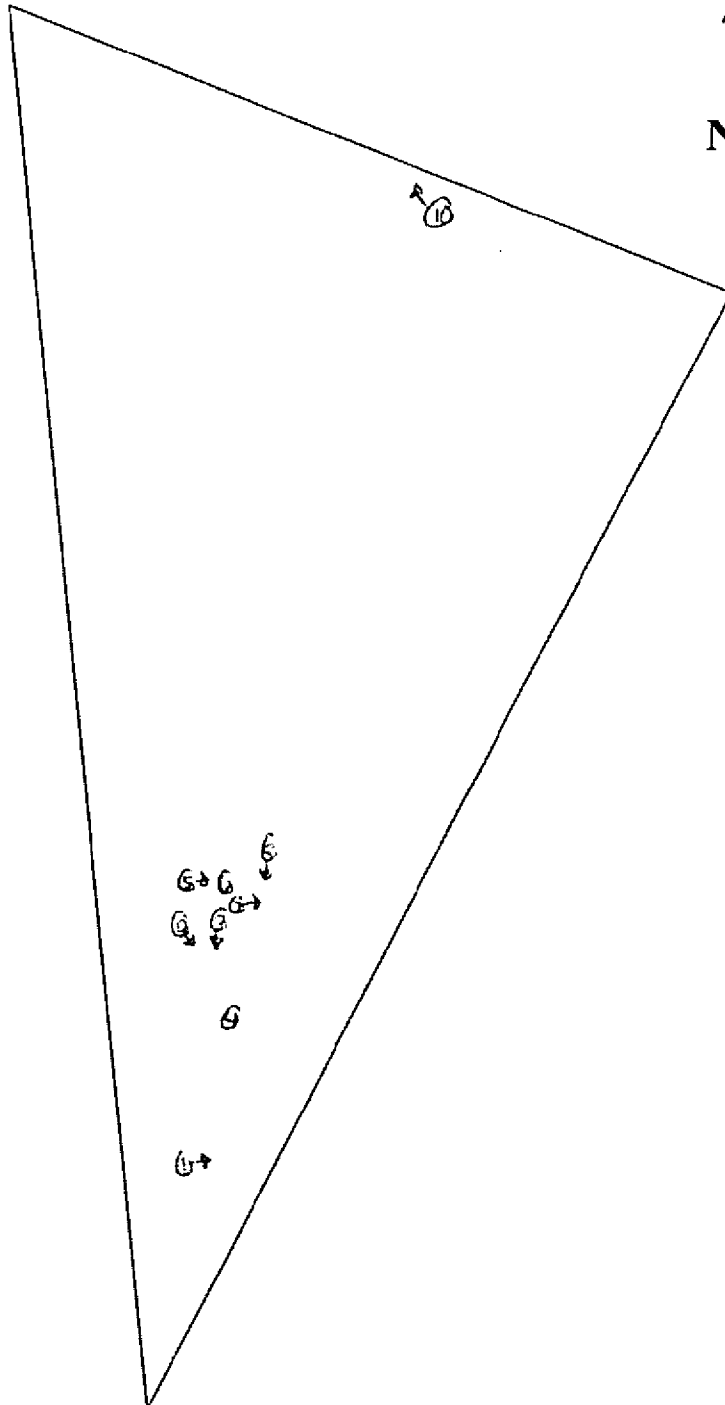
Office

Rock Crusher

Citizen
Drop-off

Scale

Scale
House





Date: 12-15-11 Time: 10:05 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: E

Photo Number: 12-CWH-1215-1



Date: 12-15-11 Time: 10:08 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: SE

Photo Number: 12-CWH-1215-2



Date: 12-15-11 Time: 10:11 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: S

Photo Number: 12-CWH-1215-3



Date: 12-15-11 Time: 10:13 A.M. P.M.

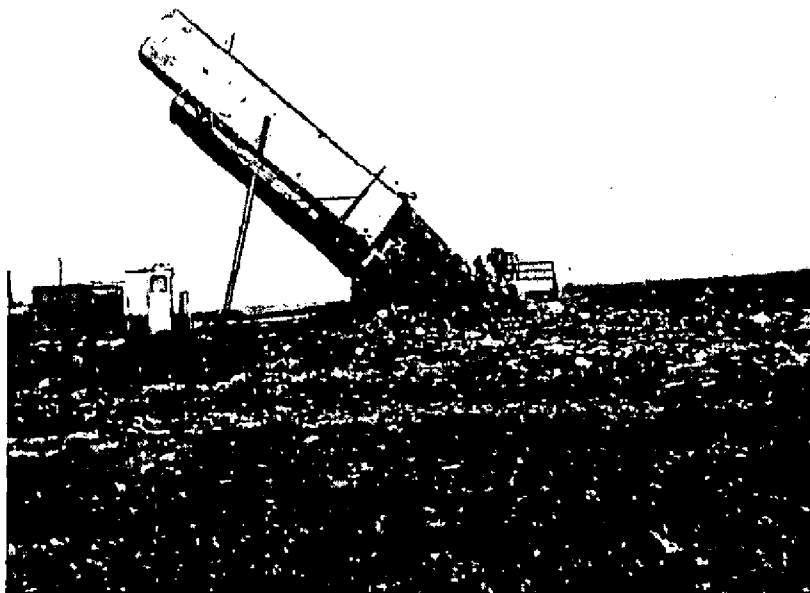
Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: CU

Photo Number: 12-CWH-1215-4



Date: 12-15-11 Time: 10:20 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: E

Photo Number: 12-CWH-1215-5



Date: 12-15-11 Time: 10:21 A.M. P.M.

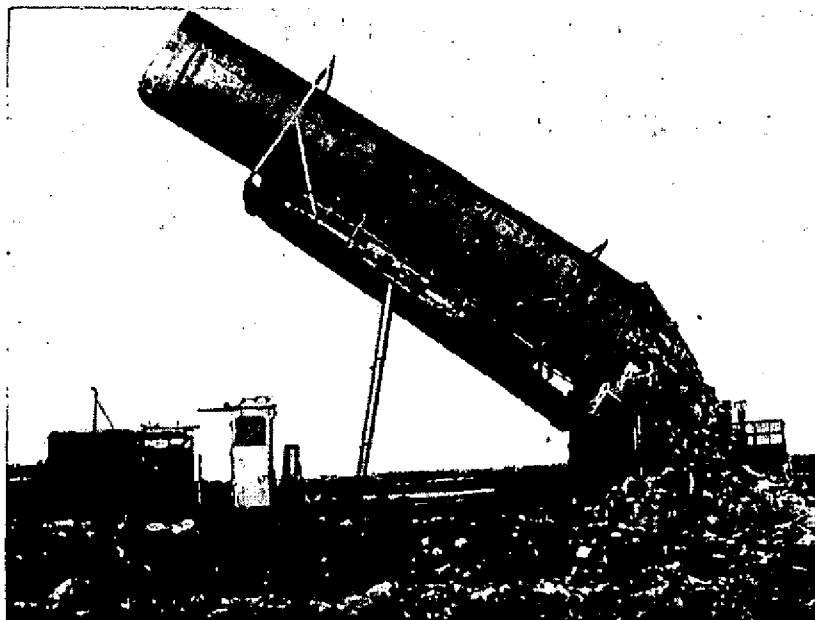
Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: CU

Photo Number: 12-CWH-1215-6



Date: 12-15-11 Time: 10:28 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: E

Photo Number: 12-CWH-1215-7



Date: 12-15-11 Time: 10:32 A.M. P.M.

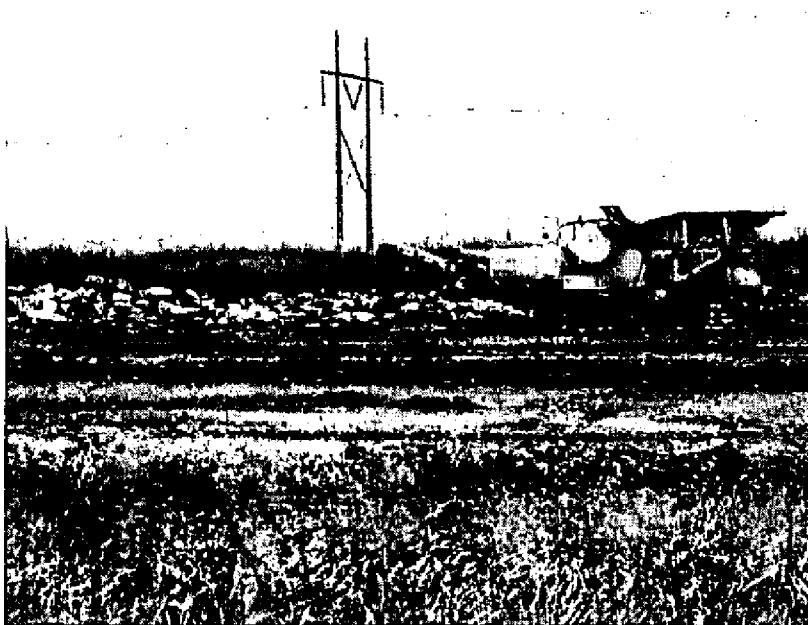
Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: S

Photo Number: 12-CWH-1215-8



Date: 12-15-11 Time: 10:40 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: NE

Photo Number: 12-CWH-1215-9



Date: 12-15-11 Time: 10:43 A.M. P.M.

Site Name: Marissa/Cottonwood Hills

Location: LPC - 1630755017 St. Clair County

Photograph By: Michael Gates

Direction: W

Photo Number: 12-CWH-1215-10